VIRGINIANS FOR HEALTHY AIR

11 EAST BEVERLEY STREET, SUITE 21 STAUNTON, VIRGINIA

May 15, 2008

Virginia Air Pollution Control Board Virginia Department of Environmental Quality PO Box 1105 Richmond, VA 23218

Dear Members of the Virginia Air Pollution Control Board:

Thank you for careful review of the Dominion Power's (also known as Virginia Electric Power Company) draft permit to construct and operate an electric generation facility in Wise County, Virginia. We oppose the Wise County facility as it is currently designed because of the impact of its pollution on Virginians' health, the environment, and our national parks.

The coal burning power plant that Dominion has designed and for which it seeks a permit uses outdated technology and would result in unacceptably high levels of pollution. Dominion has not answered the questions of why it chose to design a plant using 1980s know-how, when other power companies are making the business decision to use much less polluting designs – even for plants that will use coal as fuel. Even though Dominion has labeled the Wise County plant a "Hybrid Energy Center" it is nothing but a harmful, dirty, traditional coal burning plant. This design does not meet the requirement of the Clean Air Act that new power plants must use the best control technology that is currently available. Members of the Air Pollution Control Board and the Department of Environmental Quality (DEQ) have a responsibility to question Dominion's assertions and scrutinize the options available.

The National Park Service has determined that if this plant is built as proposed in the application, the pollution will cause serious damage to the Great Smoky Mountains National Park. Virginia's DEQ and Air Board should not allow unacceptable pollution in neighboring states – especially to one of America's most treasured national parks. Gov. Kaine has made clear his commitment to addressing global warming. It would not be responsible to construct a plant that will be in operation for 50 years or more that will contribute so significantly – and unnecessarily – to greenhouse gas emissions.

Virginians deserve healthy air. Our businesses depend on it. The health of our families requires it. Our communities will not thrive if Virginia permits continued, unnecessary pollution of our skies. If permitted as currently designed, this plant would produce high levels of pollution including 70 lb/yr of mercury, a potent neurotoxin. Given that as little as 1/70th of a teaspoon of mercury can contaminate all the fish in a 25-acre lake, the maximum should be done to limit mercury emissions, as well as the other harmful pollutants.

Dominion should feel the corporate responsibility to use the best technology available to protect Virginia's environment and the health of all Virginians. We request that you as members of the Virginia Air Pollution Control Board fully consider the case and act to ensure that they do so.

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